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2003 SEP 26 AH 11:00

T.R.A. DOCKET ROOM

Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37219-0412

Re: Docket 03-00502; Implementation of County Wide Calling Response of United States Advanced Network, Inc.

Dear Mr. Jones:

Mr. Ron Jones

Director/Moderator

United States Advanced Network, Inc. ("USAN") submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

USAN has no presubscribed customers in Tennessee. All USAN calls are travel card or operator assisted and billed via LEC billing through a third party billing aggregator. Local calls would not normally route through the company if the customer follows the dialing instructions on the phone or tent card. To the extent that customers occasionally dial local calls as if they are long distance, Connect America handles these incidental calls and bills them like any other toll calls. The company does not have the data bases necessary to identify intracounty calls on an NPA-NXX basis. In order to obtain the necessary information, the company would have to invest more revenue than it will generate in Tennessee in approximately ten years. If any customer calls to complain, identifying a billed call as intracounty, Connect America would credit the entire charge for the call, including the operator handling charges that would otherwise apply even if the call usage had been \$0.00. Connect America has received no such complaint to date.

The operational difficulties and expense of implementing real time intracounty toll free calling for operator handled calls are a true impediment for small competitors. The gains to the public would be miniscule compared to the cost. Connect America suggests a mileage surrogate for small companies would be a reasonably inexpensive approach that could be easily implemented.

The company has no suggestions as to how the proposed workshop should proceed, but offer any support required or requested by the TRA.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.

September 25, 2003 Mr. Ron Jones Director/Moderator Tennessee Regulatory Authority Page 2

Questions regarding this filing may be directed to my attention at (407) 740-8575 or via e-mail at cwightman@tminc.com.

Sincerely,

Connie Wightman

Consultant

cc: Michelle Shaw, USAN

File: USAN-TN TMS: TNx0301